

### **REMARKS**

Claims 1-5 and 7-23 are presently pending, of which claims 1, 12 and 23 are independent. Claims 1, 8, 12, 13, 18 and 23 have been amended. Support for the amendments can be found at page 3, line 30 and page 5, lines 9-10. No new matter has been added. Applicant believes that the claims are patentable and in condition for allowance as discussed below. Applicant respectfully requests reconsideration of the outstanding rejections in view of the comments set forth below.

#### **I. Claim Rejections**

Claims 1-5, 7-10, 12-19, 21 and 23 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Number 6,957,191 to Belcsak et al (hereafter “Belcsak”), or in the alternative, under 35 U.S.C. §103(a) as being obvious over Belcsak in view of U.S. Patent Number 6,069,629 to Paterson et al (hereafter “Paterson”).

Claims 11, 20 and 22 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Belcsak or in the alternative, over Belcsak in view of Paterson and further in view of U.S. Patent Number 7,139,686 to Critz et al (hereafter “Critz”).

#### **II. Claim Rejections under 35 U.S.C. §102(e)**

Claims 1-5, 7-10, 12-19, 21 and 23 have been rejected under 35 U.S.C. §102(e) as being anticipated by Belcsak (Office Action, page 2, § 5). Applicant respectfully traverses the rejection.

##### **A. Claim 1**

Amended independent claim 1 recites:

“A method comprising:  
performing an analysis or synthesis operation on a graphical model representation that includes at least one graphical object;  
producing a report from the analysis or synthesis operation;  
**associating one or more tags with a graphical object of the graphical model representation;**

**associating the one or more tags associated with the graphical object with one or more portions of the produced report corresponding to the graphical object;**

receiving a selection of the graphical object in the graphical model representation; and

displaying the one or more portions of the produced report corresponding to the selected graphical object in response to the selection.”

Applicant respectfully submits that Belcsak fails to disclose or suggest **associating one or more tags with a graphical object of the graphical model representation; and associating the one or more tags associated with the graphical object with one or more portions of the produced report corresponding to the graphical object**, as recited in amended claim 1.

To clarify the claims, Applicant has amended claim 1 to recite “tags” instead of “associations.” These tags are associated with graphical components of the graphical model representation and also with corresponding portions of a produced report. As such, the tags **associating the one or more tags associated with the graphical object with one or more portions of the produced report corresponding to the graphical object**.

Belcsak discusses a financial scenario modeling and analysis tool which includes a graphical user interface (GUI) which allows a user to create a model of the financial scenario (Abstract). The tool also includes an engine to automatically generate information which at least partially models a part of the financial scenario using information collected during creation of the model (Abstract).

The Examiner indicates that Belcsak shows the GUI allowing the user to create party graphics representing financial parties in a scenario. Each graphic connects two of the party graphics, which the Examiner interprets to be an association (Office Action, page 3, lines 22-25). Applicant respectfully submits that Belcsak simply connects two graphical components on a graphical model. The sections of Belcsak cited by the Examiner merely indicate connecting a financial instrument graphic with two of the party graphics (Col. 3, lines 45-50). Belcsak fails to disclose **associating one or more tags with a graphical object of the graphical model representation; and associating the one or more tags associated with the graphical object with one or more portions of the produced report corresponding to the graphical object**.

As correctly indicated by the Examiner, Belcsak does not provide a specific example where the individual associations within the reports are tags (Office Action, page 6). Belcsak merely displays pre-saved information that is related to the instrument or party. Applicant respectfully submits that amended claim 1 not only recites **one or more tags**, but also recites **associating one or more tags with a graphical object of the graphical model representation**; and **associating the one or more tags associated with the graphical object with one or more portions of the produced report corresponding to the graphical object**. Belcsak is silent about these claim elements.

There are no tags, the associating of tags with graphical objects nor the associating of tags with portions of a produced report in Belcsak. Belcsak indicates that double-clicking on an instrument and party tells the system to show detailed information about that instrument or party (Col. 9, lines 61-63). However, this is the information that was saved along with the instrument or party, as opposed to being produced from an analysis or synthesis operation, as recited in claim 1. Belcsak does not disclose associating a tag with the instrument or party and associating a tag with corresponding information in a *produced* report.

Accordingly, for at least the reasons presented above, Belcsak does not disclose or suggest each and every element of claim 1. Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 1 under 35 U.S.C. § 102(e).

#### B. Claims 2-5 and 7-10

Claims 2-5 and 7-10 depend from independent claim 1 and, as such, incorporate all of the elements of claim 1. Accordingly claims 2-5 and 7-10 are allowable for at least the reasons set forth above with respect to claim 1. Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claims 2-5 and 7-10 under 35 U.S.C. § 102(e).

#### C. Claims 12-19 and 21

Claim 12 recites:

“A system comprising:

means for performing an analysis or synthesis operation on a graphical model representation that includes at least one graphical object;

means for producing a report from the analysis or synthesis operation;  
**means for associating one or more tags with a graphical object of the graphical model representation;**  
**means for associating the one or more tags associated with the graphical object with one or more portions of the produced report corresponding to the graphical object;**  
means for receiving a selection of the graphical object in the graphical model representation; and  
means for displaying the one or more portions of the produced report corresponding to the selected graphical object in response to the selection.”

In light of the arguments presented above with regard to claim 1, Applicant respectfully submits that Belcsak fails to disclose or suggest **associating one or more tags with a graphical object of the graphical model representation; and associating the one or more tags associated with the graphical object with one or more portions of the produced report corresponding to the graphical object.**

Claims 13-19 and 21 depend from independent claim 12 and, as such, incorporate all of the elements of claim 12. Accordingly claims 13-19 and 21 are allowable for at least the reasons set forth above with respect to claim 12. Applicant respectfully request the Examiner to reconsider and withdraw the rejection of claims 12-19 and 21 under 35 U.S.C. § 102(e).

#### D. Claim 23

Claim 23 recites:

“A computer program product residing on a computer readable medium having instructions stored thereon which, when executed a processor, cause the processor to:

perform an analysis or synthesis operation on a graphical model representation, the graphical model representation including at least one graphical object;

produce a report from the analysis or synthesis operation;

**associate one or more tags with a graphical object of the graphical model representation;**

**associate the one or more tags associated with the graphical object with one or more portions of the produced report corresponding to the graphical object;**

receive a selection of the graphical object in the graphical model representation; and

display the one or more portions of the produced report corresponding to the selected graphical object in response to the selection.”

In light of the arguments presented above with regard to claim 1, Applicant respectfully submits that Belcsak fails to disclose or suggest to **associate one or more tags with a graphical object of the graphical model representation; and associate the one or more tags associated with the graphical object with one or more portions of the produced report corresponding to the graphical object.**

Accordingly, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 23 under 35 U.S.C. § 102(e).

#### IV. Claim Rejections under 35 U.S.C. §103(a)

##### A. Claims 1-5, 7-10, 12-19, 21 and 23

Claims 1-5, 7-10, 12-19, 21 and 23 have been rejected under 35 U.S.C. §103(a) as being obvious over Belcsak in view of Paterson.

##### 1. Claim 1

Belcsak does not disclose or suggest **associating one or more tags with a graphical object of the graphical model representation; and associating the one or more tags associated with the graphical object with one or more portions of the produced report corresponding to the graphical object.** Paterson fails at curing the shortcomings of Belcsak with regard to at least this claim element.

The Examiner notes that Belcsak does not provide a specific example where the individual associations within the reports are markup tags and that the tags are HTML tags. However, the Examiner asserts that Paterson teaches that the representations are generated and displayed in HTML or other windows or Apple applications (Office Action, page 6, lines 3-7).

Paterson generally discusses accessing the object parameters of a simulation model through a diagram panel within a user interface. The diagram panel includes icons representative of objects modeled within the simulation model. In response to identification of

the set of object parameters, an identifier for each parameter of the set is displayed within the access panel (Col. 2, lines 26-39).

The sections of Paterson cited by the Examiner merely recite that the core of Paterson's system is capable of interacting with a plurality of GUIs in a variety of operating platforms. Similar to Belcsak, Paterson does not disclose or suggest **associating one or more tags with a graphical object of the graphical model representation; and associating the one or more tags associated with the graphical object with one or more portions of the produced report corresponding to the graphical object**, as recited in amended claim 1. In both Paterson and Belcsak, pre-saved data related to the graphical elements is displayed upon user's request. However, none of these references disclose or suggest associating a tag with the instrument or party and associating a tag with corresponding information in a *produced* report. In contrast, claim 1 provides associating tags with portions of the produced report, the report being produced from an analysis or synthesis operation.

Accordingly, for at least the reasons presented above, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 1 under 35 U.S.C. § 103(a).

## 2. Claims 2-5 and 7-10

Claims 2-7 and 10 depend from independent claim 1 and, as such, incorporate all of the elements of claim 1. Accordingly claims 2-7 and 10 are allowable for at least the reasons set forth above with respect to claim 1. Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claims 2-7 and 10 under 35 U.S.C. § 103(a).

## 3. Claims 12-19 and 21

Claim 12 recites similar elements to claim 1. Specifically, claim 12 recites, among other elements, **associating one or more tags with a graphical object of the graphical model representation; and associating the one or more tags associated with the graphical object with one or more portions of the produced report corresponding to the graphical object**.

In light of the arguments presented above, Applicant respectfully submits that Belcsak and Paterson, alone or in any reasonable combination, fail to disclose or suggest at least these claim features.

Claims 13-19 and 21 depend from independent claim 12 and, as such, incorporate all of the elements of claim 12. Accordingly claims 13-19 and 21 are allowable for at least the reasons set forth above with respect to claim 12. Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claims 12-19 and 21 under 35 U.S.C. § 103(a).

#### 4. Claim 23

Claim 23 recites similar elements to claim 1. Specifically, claim 23 recites, among other elements **associating one or more tags with a graphical object of the graphical model representation; and associating the one or more tags associated with the graphical object with one or more portions of the produced report corresponding to the graphical object.**

In light of the arguments presented above, Applicant respectfully submits that Belcsak and Paterson, alone or in any reasonable combination, fail to disclose or suggest at least these claim features. Specifically, Belcsak fails to disclose or suggest the tags, the associating of the tags with the graphical objects and the associating of the tags with portions of the report. Accordingly, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 23 under 35 U.S.C. § 103(a).

#### B. Claims 11, 20 and 22

Claims 11, 20 and 22 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Belcsak or in the alternative, over Belcsak in view of Paterson and further in view of Critz. Applicant respectfully traverses the 35 U.S.C. §103(a) rejections of claims 11, 20 and 22 as set forth below.

Claim 11 depends from claim 1. Claims 20 and 22 depends from claim 12. Dependent claims incorporate each and every element of the independent claim upon which they depend. As presented above, Belcsak and Paterson, alone or in any reasonable combination, do not

disclose or suggest **associating one or more tags with a graphical object of the graphical model representation; and associating the one or more tags associated with the graphical object with one or more portions of the produced report corresponding to the graphical object**, as recited in claims 1 and 12. Critz fails at curing the shortcomings of Belcsak and Paterson with respect to at least these claim elements.

Critz generally discusses generating a report from a technical computing environment provided by a mathematical computer program. However Critz is silent about **associating one or more tags with a graphical object of the graphical model representation; and associating the one or more tags associated with the graphical object with one or more portions of the produced report corresponding to the graphical object**, as recited in amended claims 1 and 12.

As mentioned above, claim 11 depends from claim 1 and claims 20 and 22 depends from claim 12. For at least the reasons presented above, Belcsak, Paterson and Critz, alone or in any reasonable combination, fail to disclose or suggest each and every element of claims 11, 20 and 22. Accordingly, Applicant respectfully requests the Examiner reconsider and withdraw the rejection of claims 11, 20 and 22 under 35 U.S.C. § 103(a).



## CONCLUSION

In light of the above amendments and arguments, Applicant respectfully submits that all of the pending claims are in condition for allowance. Should the Examiner feel that a teleconference would expedite the prosecution of this application, the Examiner is urged to contact the Applicant's attorney at (617) 227-7400.

Please charge any shortage or credit any overpayment of fees to our Deposit Account No. 12-0080, under Order No. MWS-059RCE. In the event that a petition for an extension of time is required to be submitted herewith, and the requisite petition does not accompany this response, the undersigned hereby petitions under 37 C.F.R. §1.136(a) for an extension of time for as many months as are required to render this submission timely. Any fee due is authorized to be charged to the aforementioned Deposit Account.

Dated: August 14, 2008

Respectfully submitted,

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